

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

Maryann Mathews and Kevin Mathews
Plaintiffs

v.

Wells Fargo Bank, N.A., Alias and
John Doe, Alias and Orlans Moran,
PLLC

Defendants

C.A. No 15-389-JJM

ORLANS PC's MOTION FOR PROTECTIVE ORDER

Now comes Orlans PC, successor by merger to Orlans Moran, PLLC and moves for a protective order in response to the Request for Production and Interrogatories filed by Maryann Mathews in the above captioned matter. Specifically, Orlans PC avers that it is a Law Firm which provided legal services to clients such as Defendant Wells Fargo Bank, N.A. Plaintiffs direct discovery inquires to Orlans which relate to communication between Orlans and Wells Fargo Bank, N.A., which information and document are protected by the attorney client privilege. The extent of the Plaintiffs' inquiries also goes beyond this case to privileged communication connected with other clients of Orlans PC.

These discovery requests are protected by the attorney client privilege and are exempt from discovery. Requiring Orlans PC to provide or produce a privilege log would still require Plaintiff to disclose information that may be protected by the privilege. It would also be unduly burdensome to produce a discovery log since the documents protected are quite voluminous and would require Orlans PC to disclose the existence of its client list and information protected by the privilege for other clients.

WHEREFORE, Orlans PC prays that this Honorable court issue a protective order quashing the production of document or information related to attorney client privileged communication with respect to the Plaintiffs' requests as follows:

1. Production of documents requests numbered 2, 12, 13, 14, 15, 16, 17, 18, 19, 21, 22, 24, 25, 27 and 28; and
2. Interrogatories numbered 11, 13, 15, 9 (sic 20), 10 (sic 21), 12 (sic 23).

Together with such other and further relief as this Honorable Court deems meet and just.

Orlans PC
By its attorney

/s/ Michael R. Hagopian

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15-018435

CERTIFICATE OF SERVICE

I hereby certify that, on the 9th day of April, 2018:
I filed and served this document through the electronic filing system on the following parties: David E. Fialkow and John B. Ennis.

/s/ Michael R. Hagopian
